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Attorney for Sam Amadeo Battani

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SAM AMADEO BATTANI,

Defendant.

2:10- CR-202-RLH(GWF)

**STIPULATION AND ORDER TO
ALLOW TRAVEL OUT OF UNITED
STATES**

COMES NOW, Defendant, SAM AMADEO BATTANI, hereinafter "BATTANI", by and through his attorney of record, Chad A. Bowers, Esq., and the United States by and through counsel of record Kimberly Frayn, Esq. and submits this stipulation and order to allow a modification for Mr. Battani to travel from Los Angeles, California to Lebanon for a period from July 19, 2015 to August 29, 2015. The parties agree to the following:

1. That Defendant is currently on supervised release from a 2011 conviction for Conspiracy to Commit Bank Fraud, Wire Fraud, Access Device Fraud and Money Laundering in violation of 18 USC 357. That Defendant has been on supervised release since September of 2013 and will remain on supervised release until September of 2016. That during the time of his supervised release Mr. Battani has made modest though regular restitution payments.

2. That Defendant has maintained steady employment with the same firm for the last two years and has accrued sufficient vacation time to leave the jurisdiction during the proposed travel times and return to his current employment without any negative repercussions;

1 3. Mr. Battani's probation officer opposes this travel;

2 4. That the Defendant will be meeting his wife Iman Bleibel and minor son and staying with
3 Ms. Bleibel's family at her father's home in Lebanon and that the Defendant, his wife and his minor
4 child will all return to together to Los Angeles, California on or about August 29, 2015.

5 5. That the address of Ms. Bleibel's father in law is not included in this document as it is a
6 public record but has been contemporaneously provided to the Assistant United States Attorney in
7 this matter.

8 6. That the Defendant would travel from Los Angeles International to Istanbul Turkey and
9 then onto Beirut Lebanon between July 18-20, 2015 on Turkish Airlines and return on the same
10 common carrier to the United States on August 29, 2015.

11 7. That Defendant and his minor child are citizens of the United States who would be
12 lawfully allowed to the return to the country and Defendant's wife is a lawful permanent resident
13 who holds a "green card" who would also be lawfully allowed to return to the United States.

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1 That based on the foregoing the parties agree that Mr. Battani's conditions of supervised
2 release should be modified to allow for Mr. Battani to travel from Los Angeles to Lebanon from July
3 18-20, 2015 until August 29, 2015.

4 Dated this ____ day of June, 2015.

5 DANIEL BOGDEN
6 United States Attorney

CHAD A. BOWERS, LTD./

7 /s Kimberly M. Frayn

/s Chad A. Bowers

8 Kimberly M. Frayn, Esq.
9 Assistant United States Attoreney

Chad A. Bowers, Esq.
Attorney for Defendant

10 **ORDER MODIFYING CONDITIONS OF SUPERVISED RELEASE**

11 **Based on the foregoing it is hereby ordered** that Defendant SAM BATTANI'S conditions
12 of supervised released are temporarily modified to allow him to travel from Los Angeles, California
13 to the specific address provided to the United States Attorney's Office in Lebanon on Turkish
14 Airlines from July 18-20, 2015 returning on August 29, 2015.

15 This order does not modify Defendant Battani's conditions of supervised release for any other
16 period of time.

17 DATED this 29th day of June, 2015.

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20 ROGER L. HUNT
21 UNITED STATES DISTRICT JUDGE
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